

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LA TASHIA GAYLE,

Civil Action No.:
18-CV-09874 (GBD)

Plaintiff,

-against-

CHILDREN'S AID COLLEGE PREP CHARTER SCHOOL,
CHILREN'S AID OF NEW YORK, CASEY VIER, *In Her
Individual and Official Capacities*, and DEVON JACKSON,
In His Individual and Official Capacities.

**NOTICE OF MOTION TO
DISMISS AMENDED
COMPLAINT AGAINST
DEFENDANT JACKSON**

Defendants.

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PLEASE TAKE NOTICE, that upon the Declaration of Yale Pollack, dated April 1, 2019, the exhibits annexed thereto, the accompanying Memorandum of Law, and upon all the pleadings and proceedings heretofore had herein, Defendant Devon Jackson ("Jackson"), by his attorneys, Law Offices of Yale Pollack, P.C., will move this Court before the Honorable George B. Daniels, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order, pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, dismissing the Sixth and Seventh Causes of Action asserted against Jackson in Plaintiff La Tashia's Amended Complaint based on their failure to state a plausible claim against Jackson, together with an award of such other and further relief as this Court may deem just, equitable and proper.

Dated: April 1, 2019
Syosset, New York

LAW OFFICES OF YALE POLLACK, P.C.

By: 

Yale Pollack, Esq.

Attorneys for Defendant Devon Jackson
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TO: All Parties (*via ECF*)